

December 15, 2016

VIA ECF

Honorable J. Paul Oetken
United States Courthouse
40 Foley Square
New York, New York 10007

Re: ***Glen Craig v. Universal Music Group Inc. et al. (1:16-cv-05439-JPO)***

Dear Judge Oetken,

We are counsel for Plaintiff, Glen Craig, in the above in-captioned case. We write the Court to respectfully request that the date for fact discovery and expert discovery be extended 45 days. There are still documents that have not been exchanged between parties and with the upcoming holidays this would give both sides more time to gather documents and to take depositions. We respectfully request that fact discovery be extended to March 15, 2017 and expert discovery be extended until May 3, 2017. The original deadlines were February 3, 2017 and March 20, 2017 respectively. This is the first request for an extension of the discovery deadlines.

In terms of the individual deadlines, we respectfully request that depositions be extended until February 27, 2017 and request to admit shall be served by March 6, 2017 and expert disclosures for Plaintiff be due on March 17, 2017 and Defendant's expert disclosures be due on March 31, 2017. The original deadline for depositions is January 13, 2017, the original deadline for request to admit is January 20, 2017, the original deadline for expert disclosures for the Plaintiff is January 31, 2017 and the original deadline for expert disclosure for the Defendant is February 14, 2016.

All Defendants consent to these discovery extension dates.

The Courts consideration is much appreciated.

Respectfully submitted,

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